

September 2, 2022

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**BY CM/ECF & HAND DELIVERY**

The Honorable Lewis A. Kaplan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: ***Terra Towers Corp., et al., v. Telecom Business Solution, LLC., et al.***  
Civil Action No.: 1:22-cv-07301

Your Honor:

We represent Petitioners Terra Towers Corp., TBS Management, S.A., and DT Holdings, Inc. (collectively, “Terra”), Respondents Telecom Business Solution, LLC and LATAM Towers, LLC (collectively, “Peppertree”), and Respondent AMLQ Holdings (Cay) Ltd. (“AMLQ,” and together with Peppertree and Terra, the “Parties”) in the above-captioned action. We write in connection with Terra’s pending Petition, initiating this action and the deadline to respond thereto, which was set by the Supreme Court of the State of New York, County of New York for September 7, 2022. The Parties have conferred, and Terra represented that it intends to file an amended Petition on September 6, 2022. As such, the Parties have agreed that Peppertree and AMLQ’s deadline to respond to any operative Petition should be extended to October 5, 2022.

This is the Parties’ first request for extension in this matter and is not interposed for delay. Additionally, no Party will be prejudiced by the requested extension as this is a joint request and this action was only filed on August 22, 2022 and removed to this Court on August 26, 2022.

Accordingly, the Parties respectfully request that the Court extend the deadline by which Peppertree/AMLQ are required to respond to either the current Petition or the expected Amended Petition up to and including October 5, 2022.

We thank the Court for consideration of this joint request.

Respectfully submitted,

/s/ Gregg L. Weiner  
Gregg L. Weiner

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/s/ Michael N. Ungar  
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CC: All Counsel of Record